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11 **UNITED STATES BANKRUPTCY COURT**
12 **DISTRICT OF NEVADA**

13 In re:) Case No. BK-S-23-10423-MKN
14) Chapter 11
15 CASH CLOUD INC.,)
16)
17 Debtor.)
18)

19 **MOTION FOR AN ORDER SHORTENING TIME ON**
20 **MOTION TO MODIFY AUTOMATIC STAY**

21 **COMES NOW** Amondo Redmond, by and through counsel, Marjorie A. Guymon,
22 Esq. of Goldsmith & Guymon, P.C., and hereby files the instant Motion for an Order
23 Shortening Time on his Motion to Modify Automatic Stay. As grounds for the Motion for
24 an Order Shortening Time, Marjorie A. Guymon, Esq. of the law firm, Goldsmith &
25 Guymon, P.C. submits the accompanying Declaration explaining that Amondo must be able
26 to proceed with his “right-to-sue” letter before its expiration of May 7, 2023. This, coupled
27 with Debtor’s recently filed **APPLICATION FOR ORDER AUTHORIZING RETENTION**
28 **AND EMPLOYMENT OF THE JIMMERSON LAW FIRM, P.C. AS SPECIAL COUNSEL**
TO THE DEBTOR (ECF 122) (hereinafter “Application”), gives rise to Amondo’s Motion
to Modify of Stay to be heard at the same time as the Application.

29 DATED this 1 day of March, 2023.

30 **GOLDSMITH & GUYMON, P.C.**

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32 _____
33 Marjorie A. Guymon
34 Nevada Bar No. 4983
35 2055 Village Center Circle
36 Las Vegas, Nevada 89134
37 Attorneys for Amondo Redmond

DECLARATION OF MARJORIE A. GUYMON, ESQ.

I, Marjorie A. Guymon, upon penalties of perjury, depose and state as follows:

3 1. I am an attorney duly licensed to practice law in the State of Nevada before all state
4 and federal courts.

5 2. I represent Amondo Redmond in this matter and have full knowledge of the facts and
6 events contained herein, except those asserted upon information and belief and as to
7 those I believe them to be true.

8 3. The Debtor filed a Complaint in the Eight Judicial District Court, Clark County,
9 Nevada, Case No. A-21-839023-B against Amondo Redmond. Debtor filed an
10 Amended Complaint on February 1, 2022, involving claims of fraudulent
11 representations, interference with contractual relationships, and divergence of funds
12 to Redmond.

13 | 4. Debtor sought and obtained a Business Court specialty assignment.

14 5. Amondo thereafter filed and Answer and Counterclaim against Debtor on or about
15 June 17, 2022. Amondo filed his Amended Answer to First Amended Complaint
16 with Jury Demand and Amended Counterclaim on or about October 6, 2022.

17 | 6. Debtor filed its Answer to Counterclaim October 20, 2022.

18 7. Between the date of the original filing of Debtor's Complaint and Amondo's
19 Amended Answer and Amended Counter Claim the parties engaged in significant
20 litigation over the dismissal of the Complaint, Rule 16 Case Conferences, Status
21 Checks, Motion for Reconsideration, and Motion to Strike.

22 8. Amondo's legal counsel in the State Court matter sought and obtained permission
23 from the Nevada Equal Rights Commission to bring suit pursuant to NRS 613.420
24 and Title VII and obtained a "right-to-sue" notice February 6, 2023. *Amondo is*
25 *required to bring suit "not later than 90 days after the date of the receipt of the*
26 *right-to-sue notice...." Ninety days from February 6, 2023 is May 7, 2023.*

27 9. The claims between Debtor and Amondo involve Debtor's illegal employment
28 practices, including racial harassment and discrimination, retaliation and wrongful

1 termination under 18 U.S.C. §1981, Title VII and NRS 613.330.

2 10. At the time of the alleged illegal employment practices, Debtor was insured through

3 Kinsale Insurance Company, Policy No. 0100125100-0, with Employment Practices

4 Liability insurance of \$1,000,000.

5 11. The State Court has set a Jury Trial for March 11, 2024.

6 12. Debtor filed its Chapter 11 Bankruptcy on February 7, 2023, and filed its Suggestion

7 of Bankruptcy in the State Court case on February 9, 2023.

8 13. On or about February 16, 2023, Debtor filed its Application to employ special

9 litigation counsel so as to proceed with pending state court litigation, including

10 Amondo's case. The Application has been set for hearing on March 17, 2023 at the

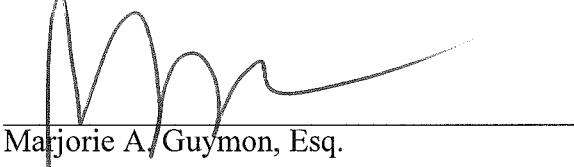
11 hour of 9:30 a.m.

12 14. Amondo must be able to proceed under his "right-to-sue" letter without delay, or risk

13 losing his right to proceed with these NRS 613.420 and Title VII claims.

14 15. Amondo is requesting that his Motion to Modify Stay be set for the same time as the

15 Debtor's Application on March 17, 2023 at the hour of 9:30 a.m.

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